

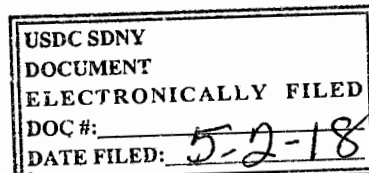
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF NEW INDIA
ASSURANCE COMPANY LTD.,

EX PARTE APPLICATION FOR DISCOVERY
PURSUANT TO 28 U.S.C. § 1782

Civil Action No. 18-Misc.

178 (LAK)



~~[PROPOSED]~~ ORDER GRANTING NEW INDIA ASSURANCE COMPANY LTD.'S *EX*
PARTE APPLICATION FOR DISCOVERY PURSUANT TO 28 U.S.C. § 1782

This matter comes before the Court by an *ex parte* application for discovery pursuant to
28 U.S.C. § 1782 (the "Application") filed by New India Assurance Company Ltd.

("Applicant"). Having reviewed the Application; its supporting memorandum of law, the

Declaration of Michael J. Frevola, dated May 1, 2018 and the Declaration of Indira Iyer, dated
April 24, 2018, as well as the exhibits thereto, the Court is satisfied that requested discovery is

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warranted pursuant to 28 U.S.C. § 1782, and the Court hereby ORDERS as follows:

1. The Application is GRANTED.
2. Applicant is authorized to issue and serve subpoenas on Bank of America N.A.;

Bank of China; The Bank of New York Mellon; Barclays Bank PLC; BNP Paribas; Citibank
N.A.; Commerzbank AG; Credit Agricole CIB; Deutsche Bank Trust Company Americas;
HSBC Bank (US) NA; JPMorgan Chase Bank, N.A.; Societe Generale; Standard Chartered
Bank; UBS AG; Wells Fargo Bank, N.A., Bank of India, and The State Bank of India
(collectively the "New York Banks") for the production of the following documents:

- A. For the period January 1, 2010 to the present, copies of all orders, instructions, or wire transfers received from a payor/transferor bank to a payee/transferee bank for the benefit or credit of, or with any reference to Anadolu Deniz Nakliyat A.S.
- B. For the period January 1, 2010 to the present, copies of any orders, instructions or wire transfers received from a payor/transferor bank to a payee/transferee bank for the benefit or credit of, or with any reference to any of the following Related Parties (as further described in Applicant's Memorandum of Law):
- i) Karcan Denizcilik İşletme Sanayii Ve Ticaret A.S.;
 - ii) Murat Edip Karahasan;
 - iii) Asim Edip Karahasan; and
 - iv) Ibrahim Tugrul Selek.
- C. For the period January 1, 2010 to the present, identify any accounts in the name of and/or held beneficially for Anadolu Deniz Nakliyat A.S. or the Related Parties, and provide the full records thereof, specifically including copies of present and historical account balance information, and records of incoming and outgoing payments.
- D. For the period January 1, 2010 to the present, identify any accounts, loans, lines of credit, or other funding arrangements to Anadolu Deniz Nakliyat A.S. or the Related Parties, and provide full records thereof.

Unless otherwise ordered,

3. The New York Banks shall produce the documents requested in their respective subpoenas within twenty-one (21) days of service of the subpoena and as required under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of New York.

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4. Until further order by this Court, the New York Banks shall preserve documents and evidence, electronic or otherwise, in their possession, custody, or control that contain information potentially relevant to the subject matter of the Applicant's document request.

5. The Court shall retain jurisdiction over the matter for the purpose of enforcement this Order, as appropriate, and assessing any supplemental request for discovery assistance by Applicant.

6. A copy of this Order shall be served with each discovery demand.

7. This order is without prejudice to any objections to or motions to quash the subpoenas or to vacate this Order.

SO ORDERED.

6. The Clerk shall terminate DI 1.

Dated: New York, New York

May 2, 2018

[Signature]
UNITED STATES DISTRICT JUDGE